

**REMARKS**

The present amendment is responsive to the Office Action dated December 24, 2009. Claims 1, 26, 27 and 28 have been amended and new claims 32-38 have been added. No new matter has been introduced by way of these amendments or new claims, support for which may be found, by way of example only, in specification paragraphs 0114-0135 and 0180-0182 and FIGS. 10-13. The rejection will be addressed in view of the claims as presented herein.

As an initial matter, applicants would like to thank the Examiner for his discussion with the undersigned attorney on February 22, 2010.

Claims 1, and 26-31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 7,058,022 to Carolan et al. ("*Carolan*") in view of U.S. Patent Publication No. 2003/01588960 to Engberg ("*Engberg*"), and in further view of U.S. Patent Publication No. 2003/0012156 to Fukuda ("*Fukuda*"). Of these, claims 1, 26, 27 and 28 are independent. Applicants respectfully traverse the rejection.

Regarding claim 1, this claim has been amended to recite, in part, that "upon acquiring the device ID and the pass phrase, the first information processing apparatus determines the product code and the serial number." Applicants' specification describes one embodiment as follows:

**[0134]** As described above, the factory 16 generates the product ID, the passphrase, the product registration number, the product code, and the serial number unique to each of the manufactured routers 12A-12J. The product ID, the passphrase, the product code, and the serial number are sent from the factory server 61 installed in the factory 16 to the device authentication server 43, and are then stored in association with each other in the storage 308 in the device authentication server 43. **Upon acquiring the product ID and the passphrase, the device authentication server 43 determines the product code and the serial number, which are stored in association with the acquired product ID and passphrase.**

(Paragraph 0134, emphasis added; see also FIG. 10 at S122)

Applicants submit that the applied combination of *Carolan*, *Engberg* and *Fukuda* does not disclose or otherwise suggest this feature. In addition, it is unclear from the Office Action where certain components are purportedly founding *Carolan* and the other cited references in the rejection. For instance, the Office Action states that *Carolan* discloses "the first information processing apparatus including: a first storage unit operable to store first identification information for authenticating the third information processing apparatus (*Carolan*, Fig 1, Col 9 Lines 60-65, *Carolan* discloses RADIUS server, which can authenticate devices on the network)."

(Office Action, p.4) The cited portion of *Carolan* states:

Alternatively, it is also possible to do RADIUS authentication without requiring modification of the DHCP protocol by passing authentication credentials from client to registration server in a separate message, having the registration server use RADIUS to authenticate with the service provider, then set or not set the client class in the DHCP server to allow the client to get an address from the service provider's range upon the next DHCP request

(*Carolan*, 9:56-64)

Applicants submit that the cited portion of *Carolan* does not disclose the claimed first storage unit of the first information processing apparatus. Similarly, the Office Action states that *Carolan* discloses:

a generating unit operable to generate third identification information that is used to connect the third information processing apparatus to the second information processing apparatus (*Carolan*, Col 10, Lines 56-66, *Carolan* discloses on how the network client device generates and transmits identification information such as MAC address, and subscriber's credentials to the service activation system 'Fig 1, 160' or the service provider network for processing).

(Office Action, p.5)

However, claim 1 also states that the third identification information includes a one-time ID, and that "the

one-time ID is generated in the first information processing apparatus." The Office Action acknowledges that *Carolyn* "does not explicitly disclose a device ID and a pass phrase; a product code and a serial number; and a one-time ID." (Office Action, p.8) In order to overcome these admitted deficiencies of *Carolyn*, the rejection relies on *Engberg*.

Nonetheless, *Engberg* discloses on how the device ID and pass phrase (*Engberg*, [0352], *Engberg* disclosed that the use of a challenge and response pass phrase) are used, along with the product code and serial number (*Engberg*, [0788], *Engberg* disclosed the use of private data), and the use of a one-time ID (*Engberg*, [0451], [0459], *Engberg* disclosed on how the one-time only identify is used in the network) for network connection. *Engberg* disclosed the one-time ID (*Engberg*, [0451], [0459], *Engberg* disclosed on the creating one-time only identity key and *Engberg* disclosed that the one-time identity is created with response to authentication of ID in the system). And the one time ID being generated as a result of authentication of the device (*Engberg*, [0939]-[0940], *Engberg* clearly discloses that there is authentication of a device in the system)

(Office Action, p.9)

Applicants respectfully disagree with this assessment of *Engberb*. Regarding cited paragraph 0352, this section of *Engberg* states "All communication channels registered have to be cross-verified. This implies that the CLIENT show that he/she has access to the channel. A simple way to do this is the one-time only key-pair with challenge and response challenge or just a keyword or number to pass when channel authentication is done." And paragraph 0788 states "In the other end an agent given access to private data analysis and counseling is seeing one identity. The actual delivery is done under another one-time-only identity. The main purpose is to contain private data and still ensure an agent's interest in fees etc." Applicants fail to understand how these statements disclose or suggest a device ID, pass phrase, product code or serial number as claimed.

The reference to a one-time only key pair is relied upon in the rejection of the claimed one-time ID. Regarding this, paragraph 0451 of *Engberg* states "3) Receiving a random seed-factor to generate one-time-only challenge/response key-pairs based on a shared secret key and an agreed algorithm." And paragraphs 0458-0459 state:

[0458] There are three basic ways technical authentication protocols are in place and used depending on CLIENT and COMPANY technical implementation:

[0459] Manually by CLIENT. From the outset this can mean CLIENT entering a one-time-only identity key hinting to his identity. TP responds by a challenge number related to a one-time-only key-pair and in return getting the related response. This procedure does not require any special electronics implemented at either CLIENT or COMPANY. It only requires CLIENT to have interacted with TP prior to the authentication procedure to receive the one-time-only keys in advance.

(*Engberg* paragraphs 0458-0459, emphasis added)

Applicants respectfully submit this is not what is claimed. Rather, as best understood, *Engberg* does not disclose a generating unit that is operable to generate third identification information for connecting a third information processing apparatus to a second information processing apparatus, where the third identification information includes a one-time ID. In addition, notwithstanding the reference to the cited portions above, applicants submit that *Engberg* does not disclose that the one-time ID is generated in the first information processing apparatus as claimed.

Thus, for at least this reason, applicants submit that independent claim 1 is not obvious over the applied combination of references. Furthermore, claims 29-35 depend from independent claim 1 and contain all the limitations thereof. For at least this reason, applicants submit that the subject dependent claims are likewise in condition for allowance.

With regard to the rejection of independent claims 26-28, applicants submit that the applied combination of *Carolan*, *Engberg* and *Fukuda* also fails to meet a *prima facie* case of obviousness for these claims for the reasons provided above. For instance, with regard to claim 26, the applied combination does not disclose or otherwise suggest that "upon acquiring the device ID and the pass phrase, the information processing apparatus determines the product code and the serial number." And with regard to claims 26-28, applicants submit that the applied combination does not disclose or suggest the first, second or third identification information as claimed.

As noted above, claims 31-38 have been added. In certain of the claims (e.g., 32-34 and 36-38), the features therein were provided in earlier claims or sections of claims that have been deleted. Applicant submits that the new dependent claims are in condition for allowance due at least to their dependency upon the respective independent claims.

As it is believed that all of the rejections set forth in the Office Action have been fully met, favorable reconsideration and allowance are earnestly solicited.

If, however, for any reason the Examiner does not believe that such action can be taken at this time, it is respectfully requested that he telephone applicants' attorney at (908) 654-5000 in order to overcome any additional objections which he might have. If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

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